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## UNITED STATES DISTRICT COURT

## DISTRICT COURT OF NEVADA

BOBBY LEN FRANKLIN, an individual, dba  
DAYDREAM LAND & SYSTEMS  
DEVELOPMENT COMPANY,

*Plaintiff*

v.

TOWN OF LAUGHLIN NEVADA,  
DON LAUGHLIN'S RIVERSIDE RESORT  
HOTEL AND CASINO, dba  
BWD PROPERTIES 2, LLC,  
BWD PROPERTIES 3, LLC,  
BWD PROPERTIES 4, LLC,  
LEAD ATTORNEY WILLIAM R. URGAS,  
UNITED STATES OF AMERICA,

*Defendants*

Case No.:

2:24-cv-00903-GMN-DJA

## COMPLAINT

Plaintiff "Franklin" *pro se* hereby complain and allege as follows:

PARTIES AND JURISDICTIONAL STATEMENT

1. This action arises under the Racketeer Influenced and Corrupt Organizations Act (RICO) 1970 as amended, for injunctions, orders, civil damages, and judgments against the defendants.

2. Pursuant to 43 C.F.R. § 1862.5 (43 U.S.C. § 1166), the defendants have allegedly defrauded Franklin out of his entered 80 acre patent rights in 43 C.F.R. § 1862.6 (43 U.S.C. § 1165) as mandated under the Desert Land Act, 43 U.S.C. § 321 et seq. (the Act), in violations to the civil RICO statutes, and the U.S. Constitution, as hereinafter more appears.

3. This court has jurisdiction of the subject matter of this action pursuant to 28 U.S.C. § 1331 because the claims asserted in it arise out of the laws of the United States. As more fully shown below, this is an action to restrain further racketeering damages done by the defendants

1 against Franklin, his two children, and his lawfully entered 80 acre estate on federal public lands  
2 that he purchased from the United States government in August of 1988.

3 4. Venue is proper in this court pursuant to 28 U.S.C. § 1391.

4 5. All defendants and companies are conducting their business in Clark County Nevada.

5  
6 GENERAL ALLEGATIONS

7 6. Pursuant to Desert Land Entry Act, 43 U.S.C. § 321 et seq., in August 1988 Franklin  
8 purchased the described 80 acres of federal public lands in the town of Laughlin Nevada from  
9 the Bureau of Land Management (“BLM”) to compete with the adjacent Clark County desert  
10 land irrigation systems. The *prima facie* proof of Franklin’s statutory desert land patent rights on  
11 his entered 80 acre estate is attached herewith as “Exhibit 1” for discovery.

12  
13 7. On 02/14/2006, D.J. Laughlin acquired the three-fractional *adverse* patent(s) from the  
14 USA and is attached herewith as “Exhibit 2” for discovery, while knowing Franklin had and  
15 holds the *stare decisis* desert land patent rights on it. Days later, D.J. (Don) Laughlin transferred  
16 his patent rights into his created “BWD LLC shell companies” to hide his real name and his real  
17 business, allegedly to defraud Franklin out of his lawfully entered 80 acre estate.

18  
19 8. On 11/21/2006, Don Laughlin paid his lead attorney William R. Urga to convince Judge  
20 Sandoval to omit Franklin’s entered patent rights from pretrial discovery evidence for trial.

21 9. On 09/29/2008, newly appointed federal Judge Sandoval granted Don Laughlin’s created  
22 ‘BWD LLC shell companies’ as owners of Franklin’s entered 80 acre estate, after they concealed  
23 Franklin’s desert land patent rights from pretrial discovery evidence for trial. Soon thereafter,  
24 Sandoval resigned as federal judge, and Franklin began investigating such shocking corruption.

25  
26 10. On 08/04/2021, Franklin filed a Motion – To Compel Discovery that was Omitted; To  
27 File The Three Exhibits as Evidence; and, To Compel Attorney Urga to Answer Interrogatories.  
28

1           11. On 05/09/2022, that District Court denied Franklin's newly discovered evidence on  
2 post-motion to open the case to *prima facie* prove his patent rights evidence have been concealed  
3 from all Orders, Judgments and proceedings in that court, and is the reason why Franklin filed  
4 this original RICO action against the named Defendants, including their LEAD ATTORNEY  
5 WILLIAM R. URGA who is a key Defendant and possibly a key witness in this RICO action.

6  
7                   THE PATTERN OF RACKETEERING DONE IN LAUGHLIN

8           12. After D.J. ("Don") Laughlin allegedly defrauded the U.S. out of its 80 acres of federal  
9 public lands on 02/14/2006 in 'Exhibit 2', days later he created his 'BWD LLC shell companies'  
10 and filed them in the NV Secretary of State Office public records, allegedly to defraud Franklin's  
11 *stare decisis* land patent rights on his entered 80 acre estate in 'Exhibit 1' pp 6-9.

12  
13           13. During all these years, Franklin has published his <https://fedlaws.xyz> website diary book  
14 of facts that reveals the dated events and public records of the real Laughlin, of which discloses  
15 the biggest fraudulent public lands embezzlement racket in Nevada history is in Laughlin.

16           14. After Don Laughlin allegedly embezzled all river front public lands (1,200 acres) from  
17 the NV Colorado River Commission (CRC) free of charge in Laughlin NV, he became first title  
18 owner of it (landlord), and the named County Commissioner(s) zoned it as his Hotel/Casino  
19 district. He then sold most of it to Hotel/Casino developers from Las Vegas, for up to a \$Million  
20 per acre of undeveloped river front dirt, and he paid no taxes on it.

21  
22           15. Robert Bilbray (aka Commissioner Woodbury's appointed chairman of Laughlin public  
23 works) and his solely owned named corporations, later embezzled the 4,800 acres of NV public  
24 lands from the CRC for free, and he sold it and swapped it to Residential & Commercial  
25 developers which built the Laughlin community, which is 2 miles south of Don Laughlin's Hotel  
26 & Casino district. The named judges, executives, lawyers, bankers and politicians involved  
27  
28

1 would all meet together for decades at their headquarters “Jolley Urga & Woodbury law firm” on  
2 the entire 16<sup>th</sup> floor of the Wells Fargo Tower at 3800 Howard Hughes Pkwy, Las Vegas, NV,  
3 where they had swapped, sold and transferred the 6,000 acres of Nevada public lands, as  
4 recorded in the Clark County NV Recorder’s Office; the Assessor’s Office; and, the Nevada  
5 Secretary of State Office public records.

6  
7 16. That left the CRC with 9,000 acres of NV public lands to dispose of, and is why U.S.  
8 Senator Harry Reid tried to snatch it up for ENN Solar Energy from China to build their tax  
9 subsidized \$5 Billion solar energy plant farm on the 9,000 acres of NV public lands in Laughlin  
10 NV, but his scheme finally failed to ever happen. See, <https://fedlaws.xyz>

11  
12 17. It also details when Franklin’s two children were forcefully taken away from Franklin’s  
13 Laughlin home and transported out of and restricted from returning to Nevada; when Franklin  
14 was severely beaten at Don Laughlin’s Riverside Hotel & Casino parking lot; and, when  
15 Franklin’s entered 80 acre estate was violently pillaged and destroyed in Laughlin NV without  
16 any warrant to do so by the Laughlin police, in violation to RICO statutes and the 4<sup>th</sup> and 5<sup>th</sup>  
17 Amendments in the U.S. Constitution. Franklin was forcefully racketeered out of Laughlin NV  
18 because he was not a member of their RICO syndicate or their corrupt business enterprise(s).

19  
20 18. All the above facts are verified in Franklin’s website diary book <https://fedlaws.xyz> by  
21 the dated photographs, Wikipedia history on the named officials, newspapers, gov’t public  
22 records, and is their predicate RICO pattern of racketeering state and federal public lands.

23  
24 19. Based on the foregoing evidence, Don Laughlin and his organizations have a pattern of  
25 racketeering, on how he allegedly acquired his Hotel/Casino district enterprise; on when he  
26 allegedly defrauded the U.S. gov’t out of its 80 acres of federal public lands in the ‘Exhibit 2’;

1 and, why he allegedly created his 'BWD LLC shell companies' to defraud Franklin out of his  
2 patent rights on his entered 80 acre estate that is mandated under the Desert-Land Act statutes.

3 CLAIMS FOR RELIEF

4 20. Plaintiff Franklin repeat and re-allege the allegations set forth in each and every  
5 preceding paragraph of the Complaint as though fully set forth at length herein.

6  
7 21. As set forth above, Defendant TOWN OF LAUGHLIN NEVADA in Clark County is  
8 liable for damages, for "encouraging" such racketeering syndicate and its corrupt business  
9 enterprise to defraud Franklin's patent rights mandated in the Desert-Land Act statutes of  
10 Congress, and to pillage and destroy Franklin's entered 80 acre estate in violations to the RICO  
11 civil statutes, and the 4<sup>th</sup> and 5<sup>th</sup> Amendments in the U.S. Constitution, 'Exhibit 1'.

12  
13 22. As set forth above, Defendant DON LAUGHLIN'S RIVERSIDE RESORT HOTEL AND  
14 CASINO and its RICO business enterprise are liable for damages, for "starting" such RICO  
15 syndicate and corrupt business enterprise ever since Laughlin was formed in Clark County.

16 22. As set forth above, Don Laughlin created the Defendants BWD PROPERTIES 2, LLC,  
17 BWD PROPERTIES 3, LLC, BWD PROPERTIES 4, LLC, shell companies to hide his true  
18 name and true business, and is liable for "participating" in their corrupt business enterprise  
19 racket, to defraud the U.S. out of its 80 acres of federal public lands in 'Exhibit 2', and to  
20 defraud Franklin out of his *stare decisis* desert land patent rights in 'Exhibit 1', after their RICO  
21 syndicate pillaged and 100% destroyed Franklin's lawfully entered 80 acre estate, in violations to  
22 the RICO statutes, and the 4<sup>th</sup> and 5<sup>th</sup> Amendments in the U.S. Constitution.

23  
24  
25 23. As set forth above, Don Laughlin and his created BWD LLC shell companies LEAD  
26 ATTORNEY WILLIAM R. URGAS is liable for the fraud he fabricated on the court to conceal  
27 Franklin's patent rights on his entered 80 acre estate that is mandated in the Desert Land Act  
28 statutes of Congress in "Exhibit 1", in violations of the RICO statutes.



5. For a judgment declaring that Don Laughlin and his created Defendants BWD PROPERTIES 2, LLC, BWD PROPERTIES 3, LLC, BWD PROPERTIES 4, LLC shell companies were solely created to defraud Franklin's patent rights, and are liable for \$1,000,000 damages from each of them, to Franklin for "participating" in their corrupt business enterprise racket, and be permanently enjoined from doing business under the civil RICO statutes.

6. A judgment declaring that Defendant UNITED STATES OF AMERICA is liable for damages to Franklin for mistakenly and secretly transferring Franklin's 80 acre patent rights onto D.J. Laughlin possession in 'Exhibit 2' without giving Franklin any notice of it, and to order this Defendant to abide by the patent laws on page 12 in 'Exhibit 1'.

7. For treble damages under the civil RICO statutes.

8. And for any other relief as this court deems appropriate.

Respectfully submitted by,

Bobby L. Franklin  
BOBBY L. FRANKLIN (*pro se*)  
Desert Land Entryman N-49548  
2451 N. Rainbow Blvd. Unit 2037  
Las Vegas, NV. 89108

5/8/2024  
Dated

830-822-4791

dlepatent@hotmail.com

STATE OF NEVADA }

COUNTY OF CLARK }

I, Naima Aslamy, a Notary Public, do hereby certify that on this 5/8/24 day of May, 2024, personally appeared before me Bobby L. Franklin, known to me to be the person whose name is subscribed to the forgoing instrument, and swore and acknowledged to me that he executed the same for the purpose and in the capacity therein expressed, and that the statements contained therein are true and correct.

Notary Public, State of Nevada

Name, Typed or Printed Naima Aslamy

My Commission Expires: 2.3.2027

